

- JENNIFER BURDIS -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
----- X  
ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X  
DATE: December 9, 2020  
TIME: 11:37 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
OF JENNIFER BURDIS, held via Zoom, pursuant to  
Notice, before Hope Menaker, a Shorthand Reporter  
and Notary Public of the State of New York.

<p style="text-align: right;">Page 18</p> <p>1                   - JENNIFER BURDIS -</p> <p>2                   MR. GAGE: Objection.</p> <p>3                A.     No.</p> <p>4                Q.     Did Mr. Grannis discuss with you how</p> <p>5 the technical director role would fit within OCTO?</p> <p>6                A.     Yes.</p> <p>7                Q.     And what did he say?</p> <p>8                A.     I don't remember what he said</p> <p>9 verbatim.</p> <p>10               My understanding of the position</p> <p>11 fitting into the organization was that we would be</p> <p>12 hiring senior individual contributors into L 8,</p> <p>13 L 9 roles to create an Office of the CTO which</p> <p>14 would -- was brand-new at Google and had not been</p> <p>15 done before, and these individuals would be</p> <p>16 industry specialists in their industry vertical.</p> <p>17               Q.     Okay. So I'm going to be adding two</p> <p>18 documents to the Box and I'll let you know when to</p> <p>19 refresh, if you have that open.</p> <p>20               A.     Sure.</p> <p>21               Q.     Okay. You should be able to see them</p> <p>22 now if you refresh.</p> <p>23               A.     I am refreshing.</p> <p>24               MR. GAGE: You said "them." I have</p> <p>25 one document. Is it more than one?</p>	<p style="text-align: right;">Page 20</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 19</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 21</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

Page 26

Page not submitted in support of  
Google's motion for summary judgment

Page 28

Page not submitted in support of  
Google's motion for summary judgment

Page 27

Page not submitted in support of  
Google's motion for summary judgment

Page 29

1 - JENNIFER BURDIS -  
2 qualifications for the technical director role,  
3 where -- where in GHire would that be located?  
4 A. It would be under the requirements in  
5 GHire where there is a section to input minimum  
6 qualifications.  
7 Q. Do you recall what those minimum  
8 qualifications were with respect to the technical  
9 director role?  
10 A. I don't.  
11 Q. Okay. So how did you determine  
12 whether a candidate was a match for the technical  
13 director role?  
14 MR. GAGE: Objection.  
15 A. Maybe you could rephrase.  
16 Q. Sure. So when a candidate applied  
17 for the technical director position, what factors  
18 did you use to determine whether they would be  
19 brought in for an interview?  
20 A. So there were a number of different  
21 factors taken into account. Industry experience  
22 would be one of them. The extent of a candidate's  
23 experience and years of experience would play a  
24 part in that decision. Relevant experience with  
25 regard to the specific area of technology and also

<p style="text-align: right;">Page 30</p> <p>1 - JENNIFER BURDIS -</p> <p>2 for the industry verticals we were hiring for,</p> <p>3 relevant experience within that domain.</p> <p>4 Q. Anything else?</p> <p>5 A. Educational background is also</p> <p>6 another factor, so we consider.</p> <p>7 Q. Okay. So when you said that years of</p> <p>8 experience played a part in your determination,</p> <p>9 can you speak more about that? What were the</p> <p>10 years of experience that you considered?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. The -- the boundaries of years of</p> <p>13 experience are not concrete, so that's difficult</p> <p>14 to answer.</p> <p>15 Q. Okay, and so at the time that the</p> <p>16 candidates came in for an interview, had you made</p> <p>17 an assessment about their level?</p> <p>18 A. An initial one, yes.</p> <p>19 Q. So this was a preinterview initial</p> <p>20 assessment?</p> <p>21 A. Yes.</p> <p>22 MR. GAGE: Objection.</p> <p>23 Q. Okay. Was there any policy that laid</p> <p>24 out how years of experience translated into level?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 32</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 31</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 33</p> <p>1 - JENNIFER BURDIS -</p> <p>2 we were considering Ulku at Level 8. I don't</p> <p>3 remember exactly which documents that information</p> <p>4 would reside on.</p> <p>5 Q. Okay, and did you always document</p> <p>6 your assessment, your preinterview assessment, for</p> <p>7 a candidate's level?</p> <p>8 A. Yes.</p> <p>9 Q. And did you review any criteria in</p> <p>10 making that assessment?</p> <p>11 A. Yes.</p> <p>12 Q. And what did you review?</p> <p>13 A. The minimum qualifications and the</p> <p>14 factors that I previously listed when we consider</p> <p>15 where a candidate might fit within the</p> <p>16 organization level-wise.</p> <p>17 Q. Okay, and did you document this in</p> <p>18 GHire?</p> <p>19 A. I don't recall --</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. I don't recall if it's written in</p> <p>22 GHire.</p> <p>23 Q. Do you recall whether it's written</p> <p>24 anywhere else?</p> <p>25 MR. GAGE: Objection.</p>

Page 50

Page not submitted in support of  
Google's motion for summary judgment

Page 52

Page not submitted in support of  
Google's motion for summary judgment

Page 51

Page not submitted in support of  
Google's motion for summary judgment

Page 53

- JENNIFER BURDIS -

1 notification of SVP approval and at that point  
2 you -- the recruiter can extend an offer.

3 Q. So aside what was in GHire for the  
4 technical director position, did any interviewers  
5 tell you what their decision to hire someone was  
6 based on?  
7

8 A. Everything will be in GHire.

9 Q. And did Will Grannis make a  
10 recommendation to the hiring committee?

11 MR. GAGE: Objection.

12 A. There was no hiring committee.

13 Q. And so you would assess Mr. Grannis'  
14 recommendation as well as the interviewers to  
15 determine whether to extend an offer?

16 MR. GAGE: Objection.

17 A. My extending the offer was purely  
18 based on SVP approval.

19 Q. And the SVP would review the package  
20 that you prepared?

21 A. Correct.

22 MR. GAGE: Objection.

23 Q. So who made the decision about what  
24 level a candidate for technical director would be  
25 hired at?



<p style="text-align: right;">Page 54</p> <p>1                   - JENNIFER BURDIS -</p> <p>2           A.       Many people through the process.</p> <p>3           Q.       And who are those?</p> <p>4           A.       The final decision would be the SVP</p> <p>5       to review and approve, but the checkpoints of</p> <p>6       deciding where a candidate would reside level-wise</p> <p>7       through the process would include the recruitment</p> <p>8       team, the interview panel, the hiring manager, and</p> <p>9       the two SVP reviewers.</p> <p>10          Q.       And who was the SVP in this -- in</p> <p>11       this, for the technical director position?</p> <p>12               MR. GAGE: Objection.</p> <p>13          A.       Diane Greene had access to Ulku's</p> <p>14       packet or Holtz and Sridhar. The two additional</p> <p>15       SVPs were Urs, U-R-S, Holtz and Sridhar. I can't</p> <p>16       recall his last name enough to be accurate.</p> <p>17       Sridhar, S-R-I-D-H-A-R. Sridhar.</p> <p>18          Q.       So who made the final decision with</p> <p>19       respect to Ms. Rowe's level?</p> <p>20               MR. GAGE: Objection.</p> <p>21          A.       The SVP I just listed.</p> <p>22          Q.       And was that doc -- was that decision</p> <p>23       documented anywhere?</p> <p>24          A.       Yes, in GHire.</p> <p>25          Q.       And did Mr. Grannis make a final</p>	<p style="text-align: right;">Page 56</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 55</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 57</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

Page 94

Page not submitted in support of  
Google's motion for summary judgment

Page 96

Page not submitted in support of  
Google's motion for summary judgment

Page 95

1                   - JENNIFER BURDIS -  
2       enough to speak to those factors.  
3       Q.       Okay. Do you recall generally what  
4       the criteria was for most Level 8s?  
5       A.       I mean, outside of what I previously  
6       explained in relation to the factors that we  
7       consider when assessing level, number of years  
8       experience play a part and relevant work  
9       experience in a candidate's work history plays a  
10      part. For the office of the CTO specifically, the  
11      industry vertical where the candidate is a  
12      specialist and an expert would also play a part.  
13      So the previous roles held also would play a part.  
14      Q.       Okay, and then if you scroll  
15      down -- well, not too far down. It's actually the  
16      next line. Do -- did you tell ER that the same  
17      leveling factors are used across the board in  
18      staffing?  
19      A.       I don't recall saying that  
20      specifically. There are similarities when  
21      assessing levels for candidates across the board,  
22      but they are guideline-based; and there may be  
23      some nuances when looking at certain job families  
24      or job ladders that might differ from one to the  
25      other.

Page 97

Page not submitted in support of  
Google's motion for summary judgment